



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

June 23, 2015

Mr. Cary Cohrs, President
American Cement Company, LLC.
4750 East County Road 470
Post Office Box 445
Sumterville, FL 33585

Re: Sumterville Cement Plant
Facility ID No. 1190042
Pyroprocessing System (Emissions Unit No. 003)
Request for Portland Cement MACT Compliance Date Extension

Dear Mr. Cohrs:

On May 29, 2015, the Department of Environmental Protection (Department) received a request¹ submitted on behalf of American Cement Company (ACC) for an extension of the compliance date for 40 CFR 63, Subpart LLL - National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry (Portland Cement MACT rule)² for the cement kiln at the Sumterville Cement Plant. Specifically, ACC requests a one-year extension of the compliance date from September 9, 2015 to September 9, 2016 with respect to hydrochloric acid (HCl) and mercury (Hg) emissions limits from the kiln and all other requirements associated with these pollutants (monitoring, recordkeeping, reporting, etc.). Federal regulations allow for up to a one-year extension to comply with MACT standards for purpose of installing controls.³ The authority to grant such an extension is delegated to the Department, which operates an approved Title V air operation permit program.⁴

HCl Monitoring

The extension request states that ACC has procured and initiated the installation of the continuous emissions monitoring system (CEMS) for HCl that is required under the Portland Cement MACT rule. The rule also requires that the CEMS be certified using the new EPA Performance Specification 18 (PS 18) for HCl monitors, but EPA has not yet finalized PS 18. Additionally, the rule requires the use of calibration gases that are National Institute of Standards and Technology (NIST)-traceable, but NIST-traceable HCl calibration gases are currently only available from one vendor. Due to this limited availability, ACC will not be able to demonstrate continuous compliance by the September 9, 2015 compliance date. At this time, it is unknown when these situations, which are outside the control of ACC and could not reasonably have been anticipated by ACC, will be resolved.

Hg Monitoring

The extension request states that ACC has procured and initiated the installation of the CEMS for Hg that is required under the Portland Cement MACT rule. Certification of the Hg CEMS requires the use of NIST-traceable Hg calibration gases, but NIST-traceable Hg calibration gases are not yet commercially available. As a result, ACC

¹ ACC initial extension request dated 5/29/2015. <http://arm-permit2k.dep.state.fl.us/psd/1190042/U0002609.pdf>

² The Maximum Achievable Control Technology (MACT) standards are specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Portland Cement Manufacturing Industry. See Title 40, Part 63, [Subpart LLL](#) of the Code of Federal Regulations (CFR) adopted and incorporated at Rule 62-204.800(11)(b)48., F.A.C.

³ See the NESHAP General Provisions at [40 CFR 63.6\(i\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1., F.A.C.

⁴ See the NESHAP General Provisions at [40 CFR 63.6\(i\)\(4\)\(i\)\(A\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1, F.A.C.

June 19, 2015

will not be able to demonstrate continuous compliance by the September 9, 2015 compliance date.

EPA guidance

In an email correspondence ([Link to EPA Email](#)) from the EPA Office of Air Quality Planning and Standards (OAQPS) to EPA regional offices dated May 13, 2015, EPA acknowledges that the issues outlined above are legitimate reasons for which facilities will be unable to comply with the HCl and Hg monitoring requirements of the rule by the September 9, 2015 compliance date. Also, EPA specifically states that, "These issues are tied to installation of controls whereby processes/control systems cannot be effectively operated without the feedback from the associated continuous emissions monitoring systems. Thus, we believe approval of these requests for extension of compliance is recommended for a period of one year regarding both the HCl compliance limit and the mercury compliance limit."

Given the information detailed above, the Department finds that ACC's request meets the criteria for obtaining an extension of the compliance date from September 9, 2015 to September 9, 2016 for the kiln. Your one year compliance extension request regarding Part 63 Subpart LLL is limited to the HCl and Hg compliance limit demonstrations. All other requirements of Part 63, Subpart LLL remain in effect. Results of HCl and Hg performance tests must be submitted in accordance with Section 63.1348 of Section 63, Subpart LLL. The Department's Central District office will incorporate this extension together with the proposed conditions in Attachment A into ACC's Title V air operation permit.

If you have any questions regarding this matter, please contact David Read at 850-717-9075.

Sincerely,

For:

Jeffery F. Koerner, Deputy Director
Division of Air Resource Management

cc:

Max Lee, Koogler and Associates: mlee@kooglerassociates.com

Charles Robertson, Sumterville Cement Plant Environmental Manager: crobertson@americancementcompany.com

Tom Lubozynski, FDEP Central District: tom.lubozynski@dep.state.fl.us

Stephen Amirault, FDEP Central District: stephen.amirault@dep.state.fl.us

ATTACHMENT A

Proposed Conditions for Draft Title V Operation Permit

1. Compliance Date Extension: For the Pyroprocessing System (Emissions Unit No. 003), the Portland Cement MACT compliance date is extended from September 9, 2015 to September 9, 2016 specifically for the hydrochloric acid (HCl) and mercury (Hg) emission limit demonstrations to include all related requirements for these pollutants (monitoring, record keeping, reporting, etc.). Results of HCl and Hg performance tests must be submitted in accordance with 40 CFR 63.1348. [40 CFR 63, Subpart LLL; 40 CFR 63.6(i); and Rule 62-204.800(11)(d)1., F.A.C.]
2. Progress Reports: For the third and fourth calendar quarters of 2015 and the first and second calendar quarters of 2016, the permittee shall submit a report to the Department, summarizing the status of Performance Specification 18, progress to date in obtaining NIST-traceable calibration gases for HCl and Hg, and progress to date in installing and certifying the HCl and Hg CEMS. Each report shall be submitted within 15 days following the end of each calendar quarter. [40 CFR 63, Subpart LLL; 40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]